

ings would not
be recognized by one of skill in the art as the same issue or corresponding problems.
Furthermore, the Examiner heavily relies on the NA New corpus as a “large
collection” by stating that “this size reduction is especially relevant since Singhal’s search is

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performed over a large collection (p. 243, sec. 3.2, para. 1,.....)". However, the "large collection" is not what the Examiner characterizes it to be. In Section 3.2, Singhal discusses the retrieval system and notes that the NA News corpus was used "as the large collection for conservative collection enrichment (see Section 2.2)." When Section 2.2 is reviewed, it becomes clear that the large collection is utilized by some researches as a "collection enrichment" tool. A pass is run on a larger collection then the target collection so that an assumption of relevance of documents may be strengthened. The large collection is therefore not as the Examiner asserts. Singhal's search is not performed over a large collection. Rather, Singhal actually teaches that term selection and the final weights of the search terms in the target database are proposed by the top documents from the effect of collection enrichment which uses the large collection to make these modifications to the search. A detailed review of Section 2.2 will make this point clear that the large collection is not the target collection that is actually searched.

Accordingly, Applicants respectfully submit that their argument stands – namely that one of skill in the art would not find the motivation articulated by the Examiner to combine these references for the purpose of reducing the database size since the search database is already small in Singhal. The Examiner cannot rely on the large collection in Singhal because it is only used for collective enrichment as taught by Singhal and is not a search database. Therefore, Applicants maintain that there is not sufficient motivation to combine under a preponderance of the evidence standard.

Regarding point (2), Applicants recognize that Hutson does not explicitly state that speech recognition is error free. However, other than mentioning that the text-data that is processed may be a result of speech recognition (col. 2, line 11), they do not make any mention of how to deal with errors in speech recognition. The explicitly identified problem in Hutson is being "inundated with large amounts of redundant and often worthless information" as a result of large amounts of information. In this regard, the suppression of

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words in Hutson's process as it is taught is not due to errors in speech recognition but due to data volume. The mention of speech recognition is in the context of how the large volume of text data may be obtained – not in the errors that may be found within the text itself. For example, the “worthless” information is not information that contains errors, but information that is termed “data pollution” because it is so voluminous that the user who searched for data may not be inclined to read through the large number of articles on the subject. See col. 1, lines 37 – 47. Applicants respectfully submit that a fair reading of what is taught by Hutson to be “worthless” does not encompass terms in vectors that are not recognized by the recognizer.

Also, on point (2), the Examiner again relies on keeping the search space as small as possible as a reason for combining, which has been addressed above. Applicants respectfully submit that the motivation to combine is a decision that is weighed on both sides with the preponderance of the evidence standard being the guiding standard to apply. Applicants have answered the Examiner's previous argument and current argument being the NA New corpus as the large collection. This is the cornerstone of the Examiner's case for sufficient motivation to combine. Since the NA New corpus is not a large collection that is used for a search as is taught in Singhal, Applicants submit that this and the other reasons set forth above tip the scale in the favor of the claims being patentable over the cited references.

Accordingly, Applicants submit that Hutson should not be combined with Singhal and that claims 1 – 20 are patentable.

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CONCLUSION

Having addressed all rejections, Applicants respectfully submit that the subject application is in condition for allowance and a Notice to that effect is earnestly solicited.

Respectfully submitted,

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